

LEVINE SULLIVAN
KOCH & SCHULZ, LLP

1899 L Street, NW
Suite 200
Washington, DC 20036
(202) 508-1100 | Phone
(202) 861-9888 | Fax

Seth D. Berlin
(202) 508-1122
sberlin@lskslaw.com

VIA FACSIMILE (212-805-7991)

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
Room 620
New York, New York 10007

APPLICATION GRANTED:


HON. J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

9-19-12

**Re: Adelson v. Harris, et al.
Case No. 12-Civ-6052**

Dear Judge Oetken:

The undersigned represents the defendants in the above-referenced action. I am writing, pursuant to Rule 4(B) of Your Honor's Individual Practices in Civil Cases, to request an enlargement of the page limits for the parties' memoranda of law to be filed in connection with forthcoming dispositive motions practice.

Specifically, the defendants shortly plan to file two substantive, preliminary motions, one a motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6) and the other pursuant to the applicable anti-SLAPP statute. Under Your Honor's rules, we could submit separate 25-page memoranda in support of each motion. However, while each motion is distinct, there is overlap with respect to some of the issues, and we would therefore propose to file the two motions with one combined supporting memorandum, limited to 45 pages. We expect that the combined memorandum will need to address a number of issues, including choice of law, the applicability of and standards under the relevant anti-SLAPP statute, and substantive arguments supporting dismissal both pursuant to Rule 12(b)(6) and the governing anti-SLAPP law. We believe that addressing these issues in an orderly fashion in one combined submission will be more efficient, both for the parties and for the Court. We also consent to plaintiff's filing a combined opposition to the two motions of the same length, and have advised plaintiff's counsel of our consent to do so.

Counsel for plaintiff has advised us that "the plaintiff consents to [defendants'] request that the briefing on the two motions the defendants intend to make be consolidated and that the defendants' opening brief and the plaintiff's answering brief be enlarged from 25 to 45 pages."

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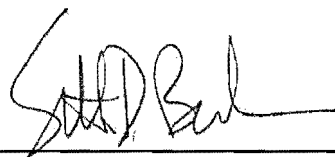


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September 14, 2012
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Thank you for your consideration of this matter.

Respectfully submitted,

LEVINE SULLIVAN KOCH & SCHULZ, LLP

By: 
Seth D. Berlin

cc: David M. Olasov, Esquire, *counsel for Plaintiff*
L. Lin Wood, Esquire, *counsel for Plaintiff*
Amy Stewart, Esquire, *counsel for Plaintiff*
(all via electronic mail)